

**IN THE UNITED STATES DISTRICT COURT
FOR THE WESTERN DISTRICT OF VIRGINIA
CHARLOTTSVILLE DIVISION**

BABY DOE, *et al.*,

Plaintiffs,

-v.-

JOSHUA MAST, *et al.*,

Defendants,

and

UNITED SECRETARY OF STATE
ANTONY BLINKEN, *et al.*

Nominal Defendants.

CIVIL NO: 3:22-cv-00049

MOTION TO APPEAR PRO HAC VICE

Pursuant to Rule 6(d) of the Court's Local Civil Rules, Edward Scott Lloyd, local counsel for Defendant Richard Mast, hereby moves for this Court to admit David Yerushalmi of the American Freedom Law Center to practice *pro hac vice* in the above-captioned matter. In support of this motion, counsel respectfully represents the following:

1. Mr. Yerushalmi has specialized knowledge and experience in litigating such matters in federal court.

2. Mr. Yerushalmi is not a member of the bar of this Court and is not licensed to practice in the Commonwealth of Virginia.

3. Mr. Yerushalmi is licensed to practice and a member of good standing before all courts in the District of Columbia (#978179-admitted 2008), State of New York (#4064606-admitted 2008), State of California (#132011-admitted 1987), State of Arizona (#009616-admitted 1984).

4. Mr. Yerushalmi is a member in good standing and duly admitted to practice before the following federal courts:

- Supreme Court of the United States
- U.S. Court of Appeals, Federal Circuit, District of Columbia Circuit, First Circuit, Second Circuit, Sixth Circuit, and Ninth Circuit
- U.S. District Courts for the Districts of Arizona, Central District of California, Eastern District of California, Northern District of California, District of Columbia, Eastern District of Michigan, Western District of Michigan, Southern District of New York, Eastern District of New York, Northern District of New York, and Western District of New York.

5. Mr. Yerushalmi has familiarized himself with the local rules of this Court and upon admission *pro hac vice* will promptly apply for ECF privileges.

6. Mr. Yerushalmi is of good character and standing and has the requisite experience and professionalism to appear before this Court and zealously advocate for Defendant Mast's interests.

7. Mr. Yerushalmi's contact information is:

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WHEREFORE, counsel respectfully requests the Court admit David Yerushalmi *pro hac vice* to practice before this Court solely in the above-captioned matter. Counsel also moves that the Court exercise its discretion to allow Mr. Yerushalmi to "appear at hearings or trials in the absence of an associated member" pursuant to Local Rule 6(d).

Respectfully submitted this 27th day of January, 2023.

/s/ E. Scott Lloyd
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Counsel for Defendant

CERTIFICATE OF SERVICE

I hereby certify that on January 27, 2023, a copy of the foregoing was filed electronically. Notice of this filing will be sent to all parties for whom counsel has entered an appearance by operation of the Court's electronic filing system. Parties may access this filing through the Court's system. I further certify that, there being no parties for whom counsel has not yet entered an appearance, no copies copy of the foregoing has been served by ordinary U.S. mail.

/s/ E. Scott Lloyd
E. Scott Lloyd